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U.S. District Court
District of Maryland
JIM USAO#2014R00476

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2014 SEP 25 PM 3:54

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

BY *[Handwritten signature]*

DEPUTY

CRIMINAL NO. WDQ-14-0448

v.

RICHARD ALAN BLANK, JR.,
Defendant.

: (Production of Child Pornography,
: 18 U.S.C. § 2251(a); Possession of Child
: Pornography, 18 U.S.C. § 2252A(a)(5)(B);
: Forfeiture, 18 U.S.C. § 2253)
:

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INDICTMENT

COUNT ONE

(Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about May 30, 2014, in the District of Maryland, the defendant,

RICHARD ALAN BLANK, JR.,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, which visual depiction had been produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, that is, the defendant did produce images that depict Jane Doe, a minor female, engaged in sexually explicit conduct, including, but not limited to, an image file titled "0100784004704077.tn_embedded_1.jpg" that depicts Jane Doe on top of the white comforter on her bed with her knees bent and her buttocks in the air, with her face and shoulders resting on the comforter, as Jane Doe is using her hands to spread open her anal cavity which is reddened and shiny as if lubricated and what appears to be a thin electrical wire running out of her vagina and between her legs with Jane Doe's head is turned to the left and the left side of her face is partially

visible, said image having been produced utilizing one black LG Model VX 11000 cellular telephone with serial number 912KPAE2755736, which was not manufactured in Maryland.

18 U.S.C. § 2251(a)

COUNT TWO

(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about May 30, 2014, in the District of Maryland, the defendant,

RICHARD ALAN BLANK, JR.,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, which visual depiction had been produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, that is, the defendant did produce images that depict Jane Doe, a minor female, engaged in sexually explicit conduct, including, but not limited to, an image file titled "0100784004704078.tn_embedded_1.jpg" that depicts a close up of Jane Doe's anus and vagina as Jane Doe is on top of the white comforter on her bed with her knees bent and her buttocks in the air, with her face and shoulders resting on the comforter, as Jane Doe is using her hands to spread open her anal cavity which is reddened and shiny as if lubricated and what appears to be a thin electrical wire running out of her vagina and between her legs with Jane Doe's head is turned to the left, said image having been produced utilizing one black LG Model VX 11000 cellular telephone with serial number 912KPAE2755736, which was not manufactured in Maryland.

18 U.S.C. § 2251(a)

COUNT THREE

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about June 2, 2014, in the District of Maryland, the defendant,

RICHARD ALAN BLANK, JR.,

did knowingly possess and knowingly access with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant did possess one black LG Model VX 11000 cellular telephone with serial number 912KPAE2755736, which was not manufactured in Maryland, which contained one or more image files of Jane Doe, a minor female, engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)

FORFEITURE

As a result of the offenses set forth in Counts One through Three, the defendant,

RICHARD ALAN BLANK, JR.,

shall forfeit to the United States his interest in all property, real and personal, that was used, or intended to be used, to commit or to promote the commission of the offense in Counts One through Three, including but not limited to: a black LG Model VX 11000 cellular telephone, as well as any property used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, or that constitutes or traceable to gross profits or other proceeds obtained, directly or indirectly, as a result of the offense in Counts One through Three.

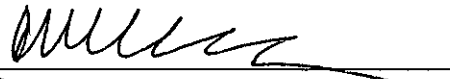
18 U.S.C. § 2253


ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

SIGNATURE REDACTED

Date


Foreperson